

U.S. Department of Justice



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July 16, 2021

BY ECF

Honorable Paul A. Crotty
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *New York Legal Assistance Grp. v. Board of Immigration Appeals*, No. 18-cv-9495 (PAC)

Dear Judge Crotty:

This Office represents Defendant in the above-captioned action, which Plaintiff brings pursuant to the Freedom of Information Act. I write on behalf of both parties to provide a status update.

As noted at the June 9, 2021, status conference, the parties are discussing whether a resolution to this action is possible without the need for further motion practice. One of the issues being discussed by the parties is the extent of any burden that would be imposed upon Defendant if it was required to release all of the materials sought by Plaintiff's FOIA request. To assist Plaintiff in evaluating Defendant's position with respect to this burden issue, on July 14, Defendant produced several thousand pages of redacted records. The goal of this production was to allow Plaintiff to see the quantity and type of information that Defendant redacts in these records. Plaintiff intends to review these records expeditiously in order to determine the extent to which they may inform the parties' discussion with respect to a possible resolution of this action. Meanwhile, the parties expect to continue discussion of other aspects of a possible agreed resolution.

Accordingly, the parties respectfully request that they provide the Court with a further status update as to these discussions by August 16, 2021.

The parties thank the Court for its attention to this matter.

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Sincerely,

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